



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

May 26, 2009

Susan Lang
Naval Facilities Engineering Command
Atlantic Division
6506 Hampton Boulevard
Norfolk, Virginia 23508-1278

SUBJECT: Final Environmental Impact Statement/Overseas Environmental Impact Statement for the Navy's Proposed Training at the Cherry Point Range Complex in North Carolina; CEQ Number 20090121

Dear Ms. Lang:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Environmental Impact Statement (EIS)/Overseas EIS in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The U.S. Department of the Navy (Navy) prepared a Final EIS/Overseas EIS to assess the potential environmental impacts over a 10-year planning horizon associated with Navy Atlantic Fleet training; research, development, testing, and evaluation (RDT&E) activities; and associated range capabilities enhancements (including infrastructure improvements) in the Cherry Point operating areas, hereafter referred to as the Cherry Point Range Complex.

Three alternatives were considered in the Final EIS: 1) no action alternative – maintain current training operations within the Cherry Point Range Complex; 2) Alternative 1 – increase and modify operational training to include expanded warfare missions, accommodate force structure changes, and enhance range complex capabilities; and 3) Alternative 2 – same as Alternative 1 with some increases in operations. Alternative 2 also includes the elimination of live bombing exercises and designation of specific mine warfare training areas in the complex. Alternative 2 was identified as the preferred alternative.

EPA's primary concerns raised in the review of the Draft EIS were related to the deposition of expended training materials and their accumulation over time. This was identified in the Draft EIS as the greatest impact of Navy training activities. EPA raised concerns about the direct and cumulative long-term impacts to the aquatic environment associated with accumulation of these expended materials in this area as part of the proposed action's 10-year plan. EPA requested additional monitoring commitments to address these concerns. EPA also raised other noise, air quality and endangered species concerns.

EPA appreciates the responses to our comments in the Final EIS. The inclusion of a more robust section on the proposed mitigation and monitoring measures, including a discussion of past mitigation effectiveness, was particularly helpful. EPA also appreciates the discussion of the newly implemented Water Range Sustainability Environmental Program Assessment (RSEPA) Policy. This policy was signed in August 2008 by the Chief of Naval Operations to ensure the long-term viability of operational ranges while protecting human health and the environment. For years, the Navy has instituted an RSEPA program designed to accomplish the same objectives but focused on upland training and testing ranges. The new Water RSEPA policy focuses on the impact of training materials expended in the marine environment. The policy suggests that protective measures will be considered and implemented to sustain range operations, maintain environmental compliance, and address risks associated with munitions constituents and military expended materials.

EPA supports the Navy in initiation of this new range program assessment tool, particularly in light of the significant increase of range training activities at several locations along the east and west coasts of the United States and Gulf of Mexico. However, the Final EIS includes no specific commitments to actually monitor the impacts of these releases into the aquatic environment at the Cherry Point Range Complex. Based on conversations with NAVFAC Atlantic, it appears that the Navy is developing plans to conduct some marine-based monitoring at some of the east coast ranges. Based on these intentions, EPA strongly recommends that the Navy include these specific commitments in the Record of Decision for the project. EPA views this commitment as an opportunity to conduct important impact assessment monitoring and utilize adaptive management to adjust training activities in the future depending on the outcome. As mentioned in our comments on the Draft EIS, EPA stands ready to assist you in developing a monitoring protocol that would meet the above objectives and address our continuing concerns.

We appreciate the opportunity to review the proposed action. Please contact Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz J. Mueller", with a long horizontal flourish extending to the right.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management